

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**STIPULATION RESOLVING ORDER DIRECTING MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL TO PAY INTERESTED
PARTY RICHARD SNYDER’S ATTORNEY FEES**

Interested Party Richard Snyder and the Michigan Department of Attorney General, by their undersigned counsel, stipulate and agree to the following:

1. On October 6, 2023, the Court entered its *Order Regarding the Contempt Motion Filed by Former Governor Richard Snyder* (the “Order”) [Dkt. No. 13759].

2. Among other things, the Order held the Michigan Department of Attorney General in civil contempt and directed the Michigan Department of Attorney General to pay former Governor Richard Snyder the reasonable attorney fees he incurred in preparing, filing, and prosecuting Interested Party Richard Snyder’s Motion for (A) An Evidentiary Hearing and (B) An Order Holding the Michigan Department of Attorney General in Contempt and Granting Related Relief (the “Contempt Motion”)[Dkt. No. 13361].

3. The Order required former Governor Snyder to file an itemization of certain attorney fees and the Michigan Department of Attorney General to file any objections to the itemization. The Court noted, however, that “if at any point the parties agree on the amount of such reasonable attorney fees, then the parties may file a stipulation and submit a proposed order.” (Order at 3 n.3.)

4. The parties have conferred and now stipulate and agree as follows:

A. At the time of the Motion’s filing, former Governor Snyder was responsible for paying all of his defense costs. Accordingly, he requested that the Court award the reasonable attorney fees he incurred in bringing the Motion as a sanction against the Department of Attorney General. (Motion, at 12-13.)

B. After the Motion was filed, former Governor Snyder and the Executive Office of the Governor (the “State”) entered into a Criminal Defense Legal Services Contract (the “Contract”) under which the State agreed to pay certain attorney fees and costs related to the criminal defense of former Governor Snyder.

C. Pursuant to the Contract, the State retroactively paid certain fees and costs former Governor Snyder incurred in relation to his criminal defense, including the fees incurred in bringing the Motion.

D. The Contract provided that if former Governor Snyder received any money for attorney fees on account of the Motion, whether by court order or

settlement, former Governor Snyder would reimburse the State for such fees up to the amount actually paid by the State.

E. Former Governor Snyder has itemized the attorney fees at issue under the Order and submitted a spreadsheet detailing those fees to the State's third-party administrator of the Contract.

F. The third-party administrator of the Contract has verified that the fees on the itemization, totaling \$95,907.50, were in fact paid by the State in accordance with the Contract.

5. Given the foregoing facts, Governor Snyder accepts the State reimbursement of \$95,907.50 under the Contract in satisfaction of the attorney fees awarded as civil contempt sanctions by the Court against the Michigan Department of Attorney General.

Accordingly, the parties respectfully request that the Court enter the stipulated order attached hereto as **Exhibit A** resolving the Department of Attorney General's obligation pay former Governor Snyder's attorney fees.

Dated: November 8, 2023

Respectfully submitted,

/s/Daniel Ping (with permission)

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